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October 23, 2015

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.
Case No. 09-50026 (REG)**

Letter Regarding Update on Related Proceedings

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC ("**New GM**") in the above-referenced matter. Pursuant to Your Honor's Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM. Specifically,

1. On October 23, 2015, the Ignition Switch Plaintiffs and Ignition Switch Pre-Closing Accident Plaintiffs filed with the Second Circuit Court of Appeals the *Supplement to the Motion to Expedite* ("**Supplement**"). A copy of the Supplement is attached hereto as **Exhibit "1."**
2. Today, October 23, 2015, counsel to New GM and Lead and Liaison Counsel filed a joint letter ("**Joint Letter**") addressed to Judge Furman to advise on matters of possible significance in proceedings related to MDL 2543, which includes an update on the status

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of this bankruptcy case. A copy of the Joint Letter, without exhibits,¹ is attached hereto as **Exhibit “2.”**

Respectfully submitted,

/s/ Scott Davidson

Scott Davidson

AJS/sd
Encl.

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¹ There are 19 exhibits annexed to the Joint Letter, many of which are documents that have previously been filed with this Court; the other documents do not appear relevant to this bankruptcy case. To the extent the Court believes the exhibits should be filed, New GM will do so promptly.